

EXHIBIT 315

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
11)

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14 Tuesday, January 22, 2019
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23 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
24 CONFIDENTIALITY REVIEW
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28 Videotaped 30(b)(6) Deposition of
29 Walmart, through the testimony of Susanne
30 Hiland, held at 4206 South J.B. Hunt Drive,
31 Rogers, Arkansas, commencing at 8:22 a.m., on
32 the above date, before Debra A. Dibble,
33 Certified Court Reporter, Registered
34 Diplomat Reporter, Certified Realtime
35 Captioner, Certified Realtime Reporter and
36 Notary Public.

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Highly Confidential - Subject to Further Confidentiality Review

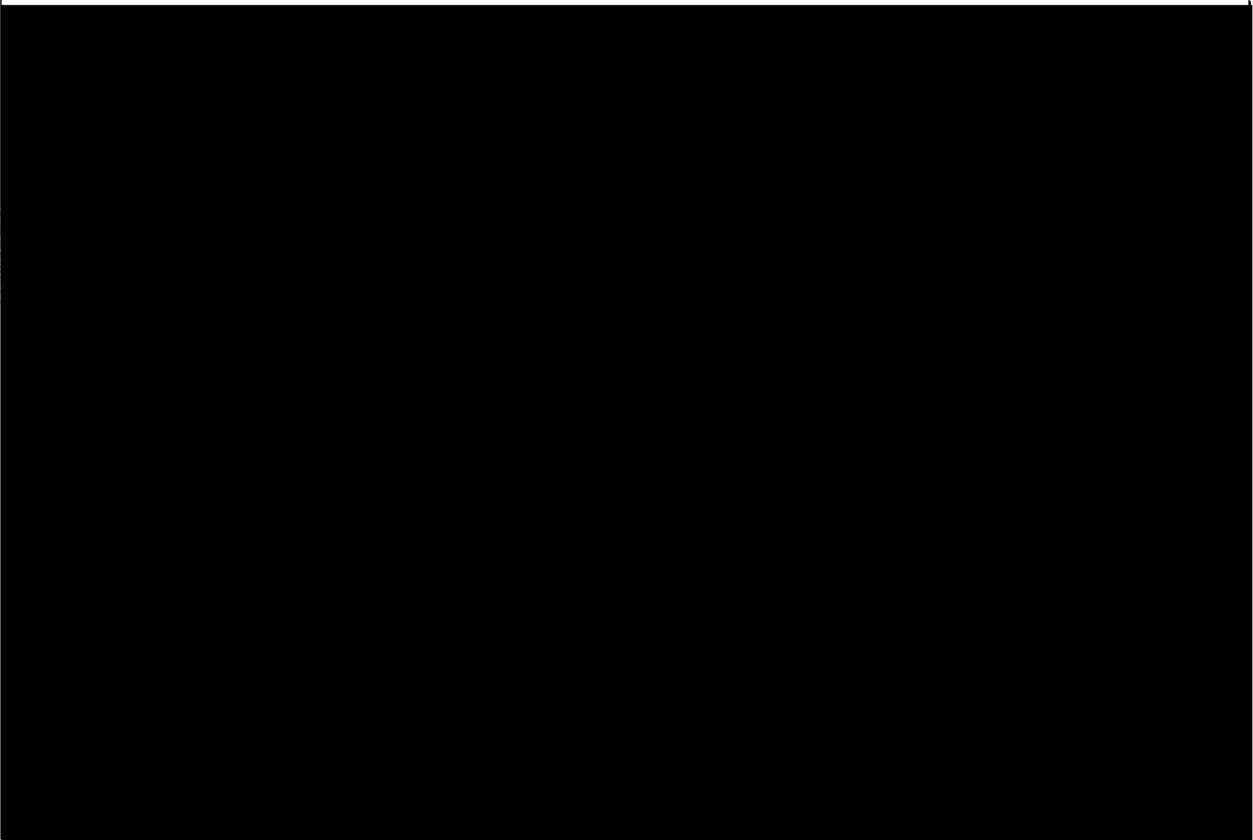
1 for unusual orders of unusual size as the
2 orders were being processed.

3 Q. And how would they determine
4 whether an order was of unusual size?

5 A. These were --

6 MS. TABACCHI: Beyond the
7 scope.

8 THE WITNESS: These were
9 long-tenured associates that
10 understood the business and the fact
11 that we were self-distributing. So
12 they saw the -- they saw the patterns.
13 They worked with it every single day.



Highly Confidential - Subject to Further Confidentiality Review

1 the policy you're referring to? Where it
2 says "From as early as 1994 until 2010,
3 employees in Walmart's pharmacy distribution
4 centers reviewed controlled drug stock
5 exception reports, followed up on orders by
6 speaking with pharmacists, and escalated
7 issues to market and/or regional leadership
8 as needed to investigate orders and to
9 resolve concerns."

10 Is that the policy you're
11 referring to?

12 A. Yes. As well as the bullet
13 that's at the very bottom of the page. So
14 I'm on my document that, for the entire
15 relevant time period, our distribution
16 associates monitored orders.

17 Q. Okay. Now, let's go in 2006,
18 what specifically were the associates doing
19 to monitor orders?

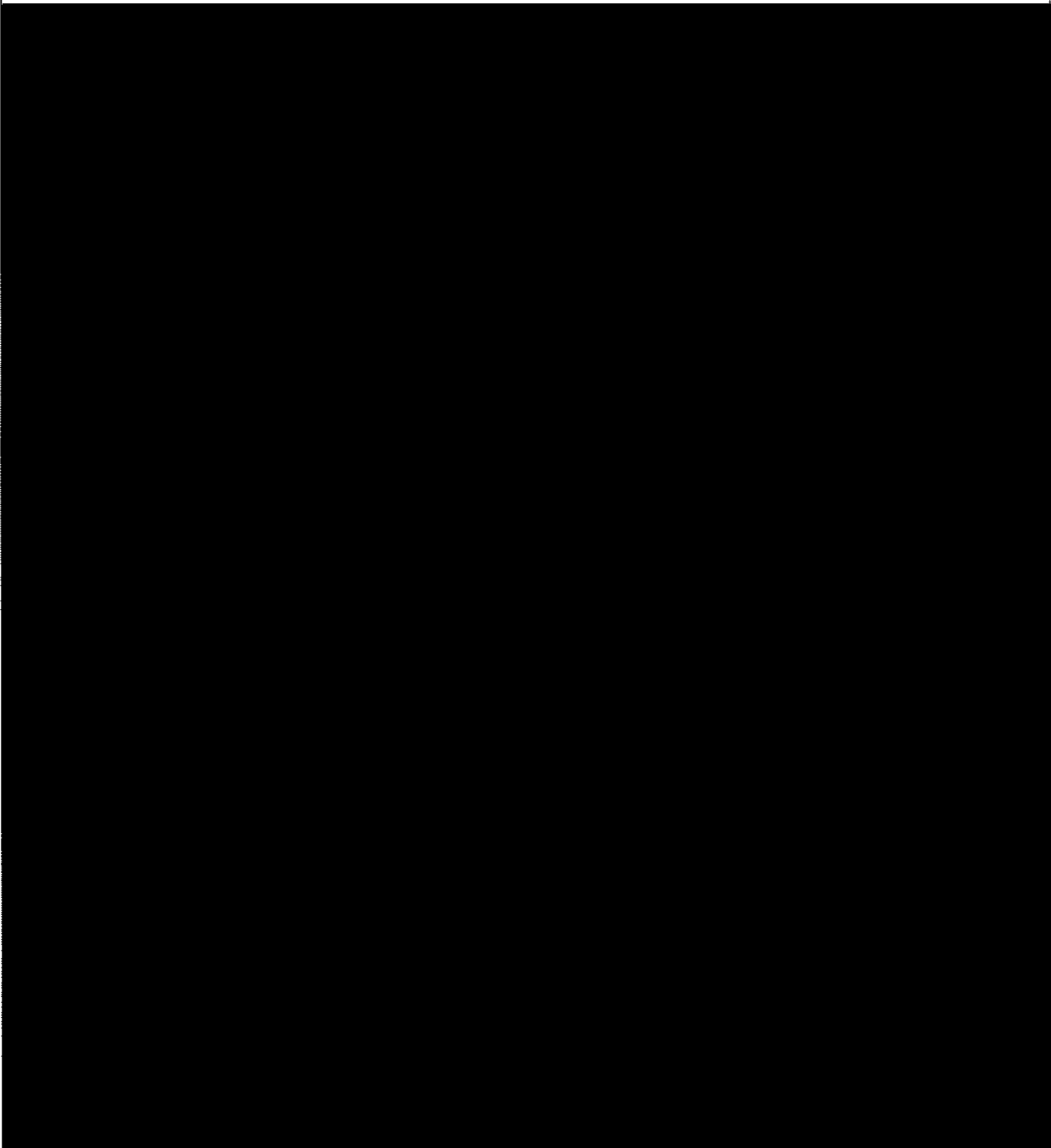
20 MS. TABACCHI: Object to the
21 form.

22 THE WITNESS: They were
23 monitoring orders as they came into
24 the distribution center, and again

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1 based on their knowledge and
2 experience of the operations. They
3 were looking for outliers. Things
4 that were outliers for them -- for
5 their knowledge.

6 Q. (BY MR. BOWER) Okay. And



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7 training as -- as the associates came
8 in around what their duties and
9 responsibilities were.

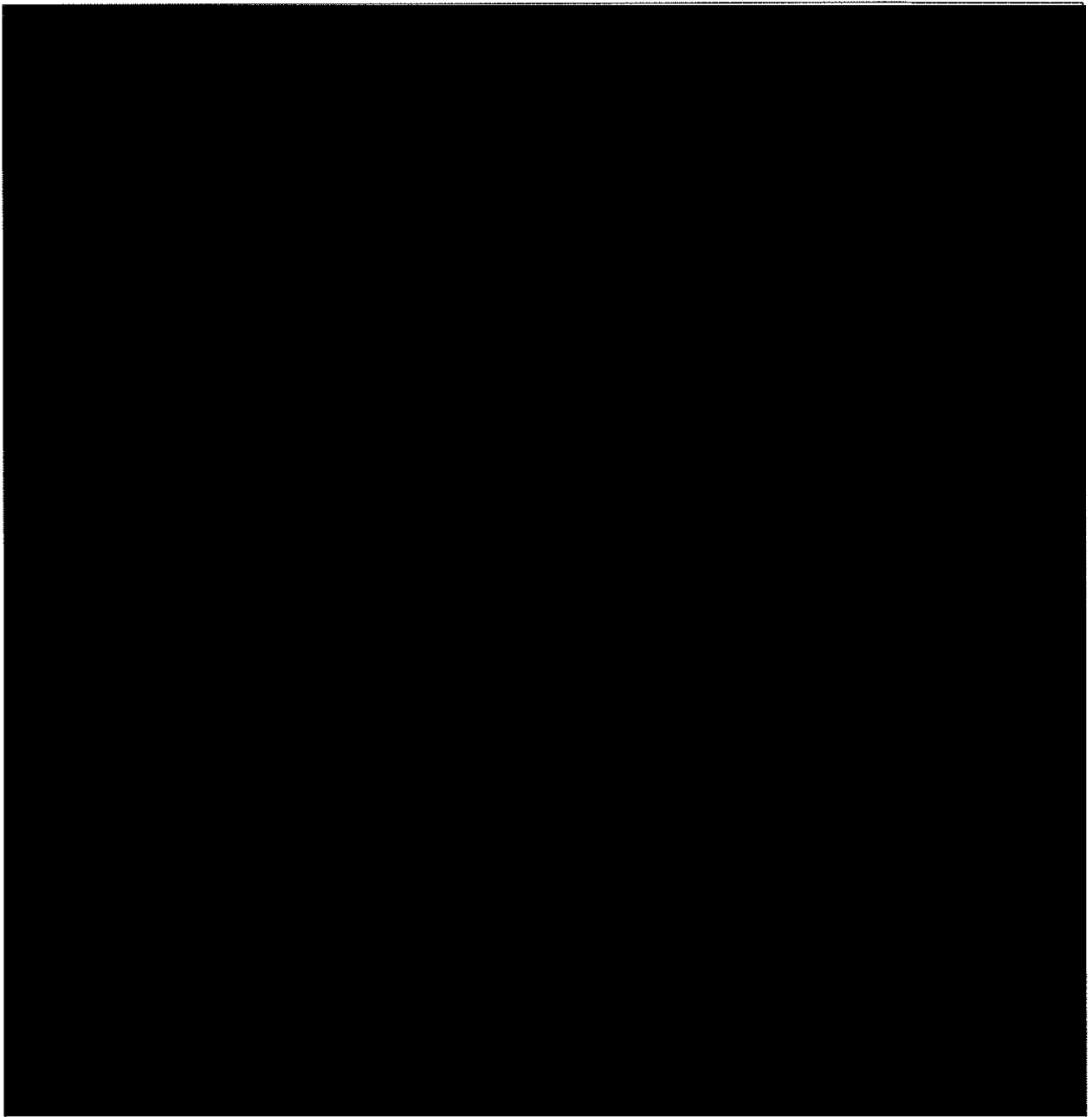
10 Q. (BY MR. BOWER) And what
11 specific training was provided in connection
12 with monitoring for orders of controlled
13 substances?

14 MS. TABACCHI: Same objections.

15 THE WITNESS: I don't have
16 specific to that -- to that topic.
17 What they understood was their
18 responsibilities, how to perform their
19 duties in their area of
20 responsibility, and the nature of the
21 items that they were --

22 Q. (BY MR. BOWER) Well, how do

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18 What did Scott tell you with
19 respect to the training for associates who
20 were reviewing orders of substances in 2007?

21 A. What he told --

22 MS. TABACCHI: Object to the
23 form.

24 THE WITNESS: What he told me

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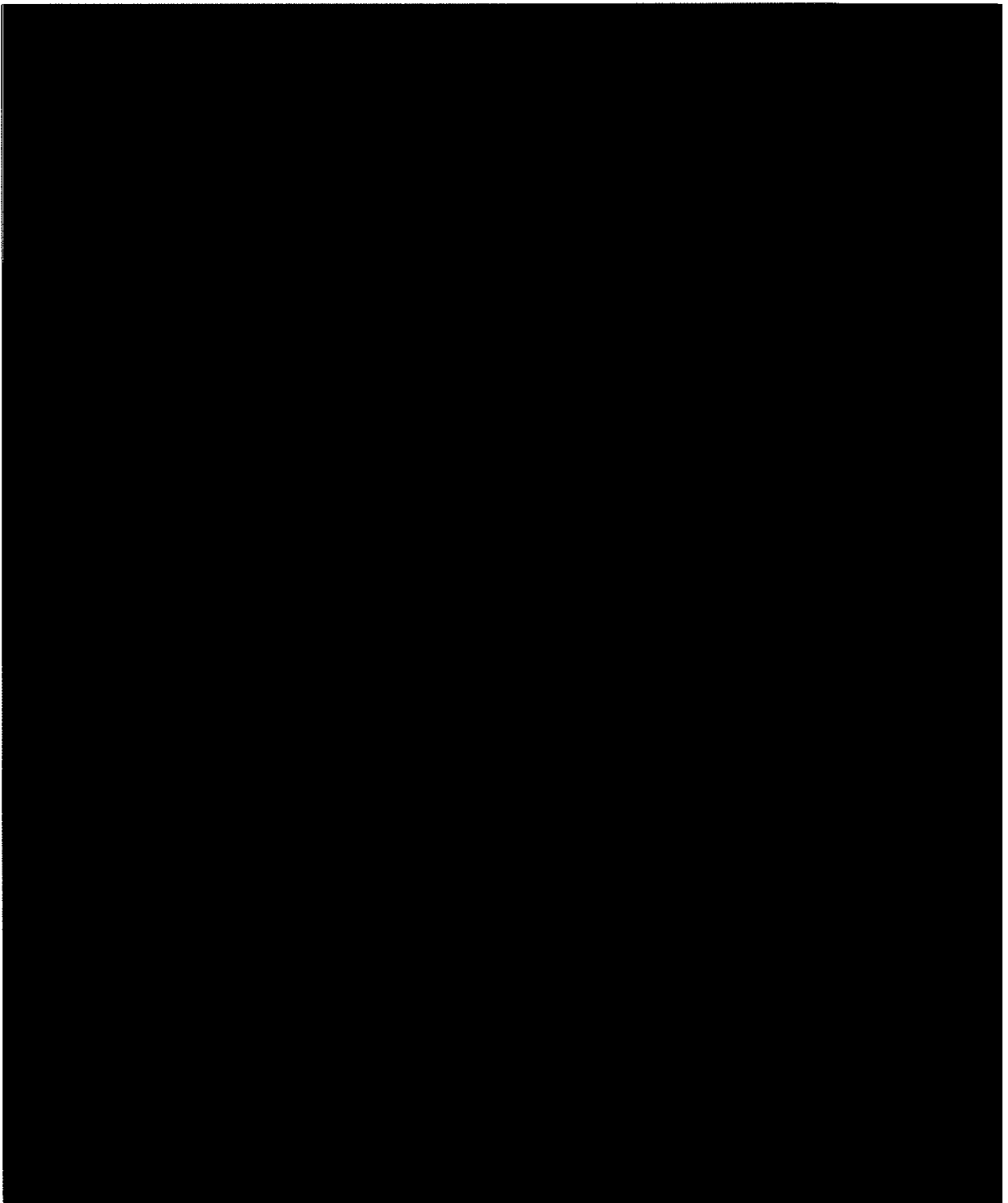
1 was that there were long-tenured
2 logistics associates that had -- many
3 of them had been in that building
4 since the day that it opened. They
5 understood their -- they understood
6 the products that they were
7 distributing. They understood their
8 role. And they were all engaged in
9 executing the policies and practices
10 at DC '45.

11 Q. (BY MR. BOWER) So is it a fair
12 statement that it was more their experience
13 and specific training that he had relied on
14 in reviewing orders for controlled
15 substances? ,

16 MS. TABACCHI: Object to the
17 form.

18 THE WITNESS: Their -- learning
19 how to do their job would be part of
20 their training. And Walmart has other
21 training plans. So to -- but specific
22 to order monitoring, it was part of
23 the job that they were trained to do.

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21 Q. (BY MR. BOWER) Were these
22 controlled drug stock exception reports used
23 by the associates at DC 6045 to monitor
24 orders for controlled substances as they

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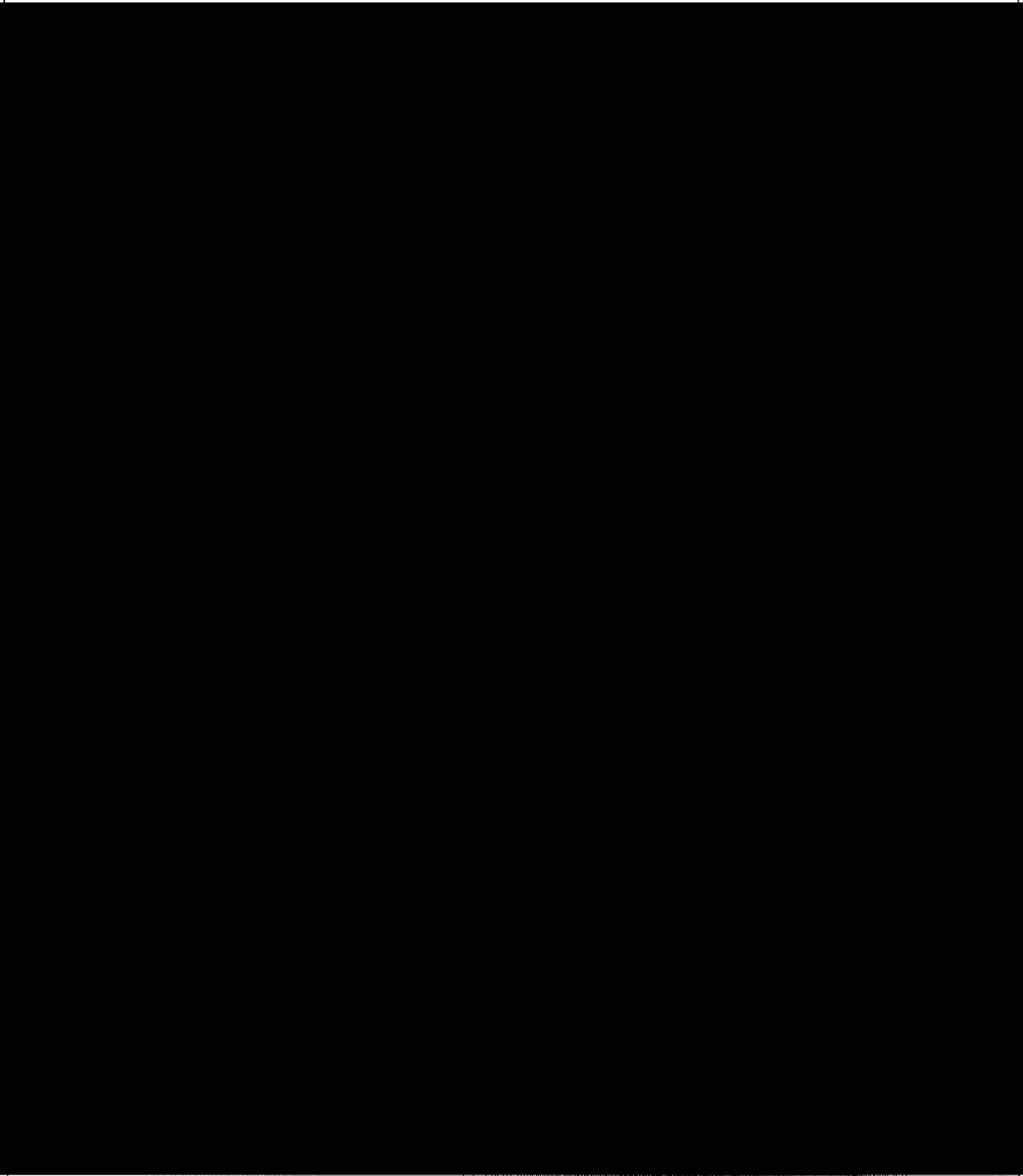
1 were -- came into the DC?

2 MS. TABACCHI: Object to the

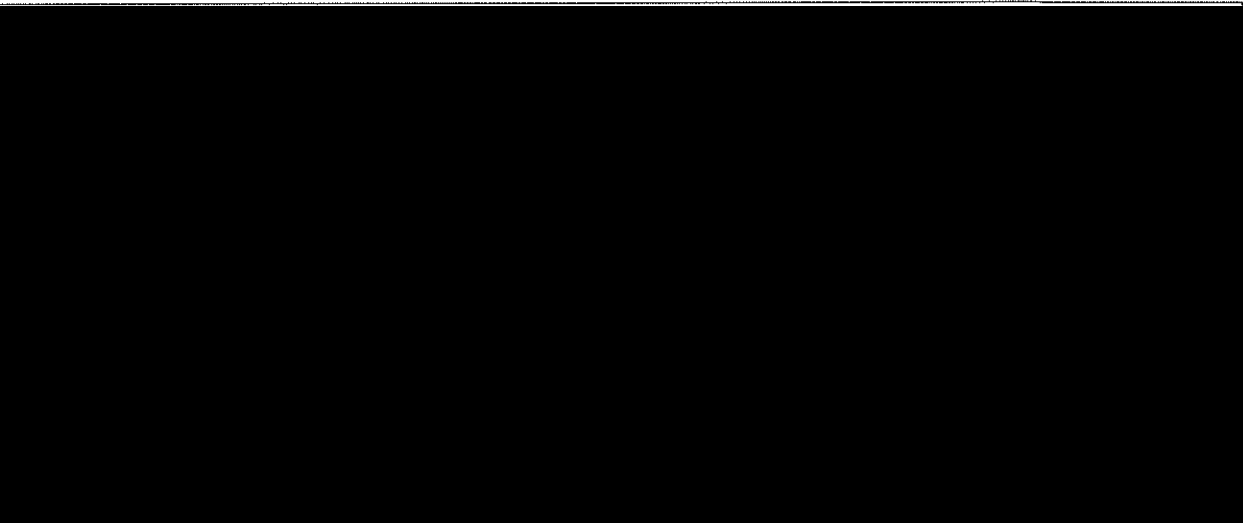
3 form.

4 THE WITNESS: No. These were

5 monthly reports.



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8 MS. TABACCHI: Zach, object to
9 the form. You need to read the entire
10 bullet and we've been on this bullet
11 for a long time.

12 MR. BOWER: We have, but we
13 haven't got much answer on it, have
14 we?

15 MS. TABACCHI: You're just not
16 satisfied with the answer you have.

17 MR. BOWER: No, I am satisfied.
18 I just don't think the witness
19 understands what I'm asking, and I'm
20 trying to ask it in a way that she
21 maybe understands.

22 Q. (BY MR. BOWER) So my question
23 is, when these orders are escalated to market
24 and/or region leadership as needed, what did

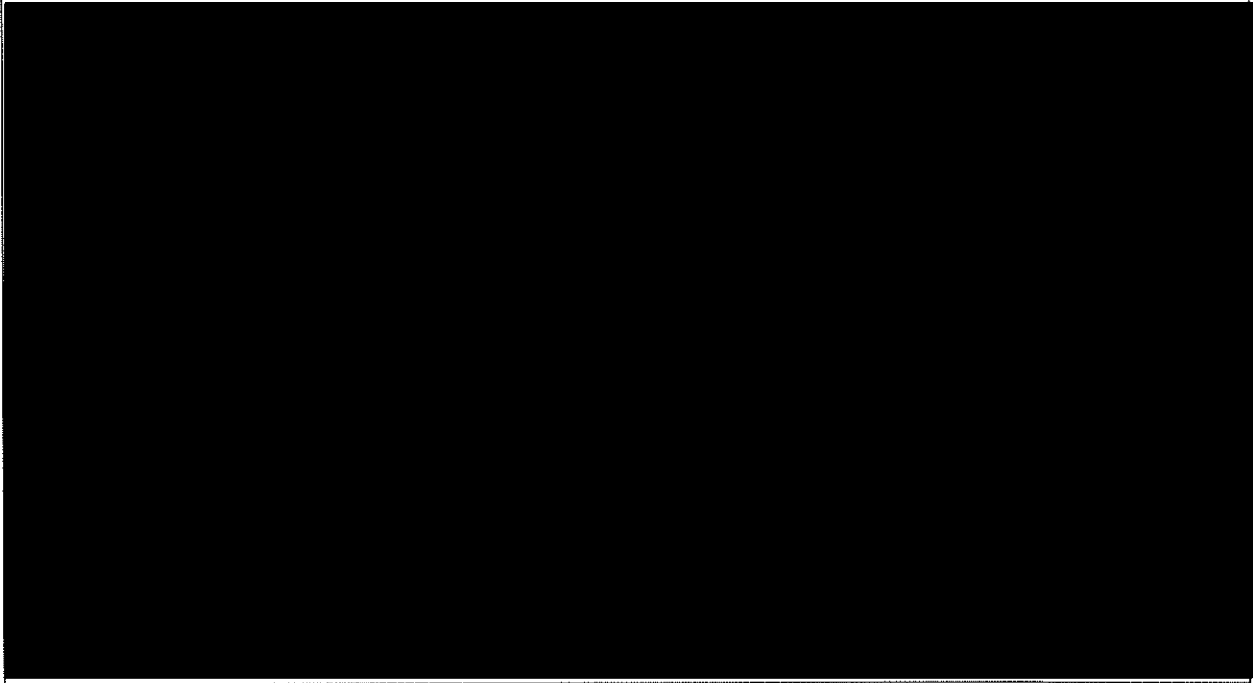
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1 those folks do? I'm just trying -- what was
2 the policy as to what those folks were
3 supposed to do?

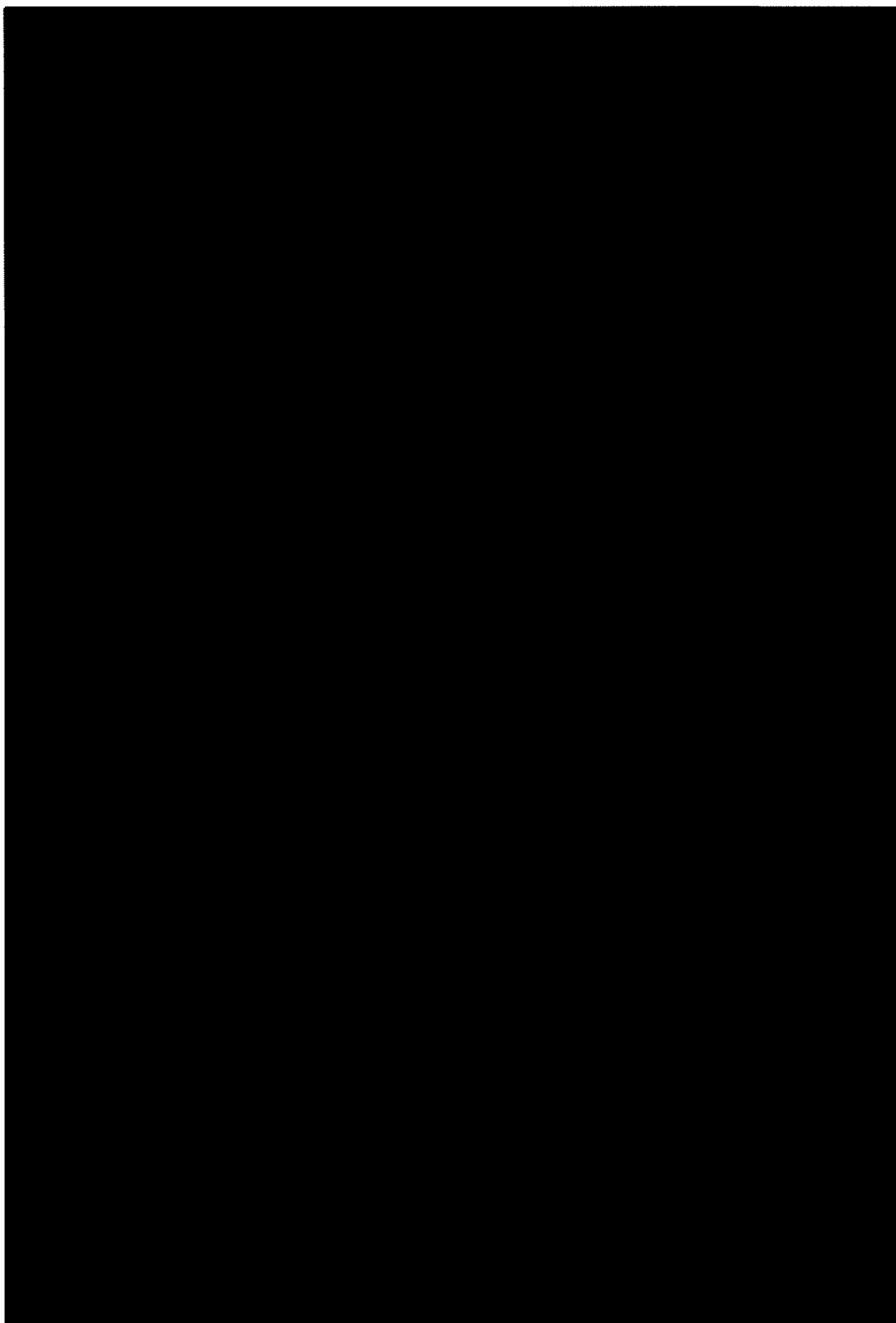
4 MS. TABACCHI: Asked and
5 answered.

6 THE WITNESS: They would have a
7 conversation with the logistics
8 associate that was reaching out to
9 them to understand what the question
10 was, and then they would go find
11 whatever information, validate what
12 they had already heard from the
13 pharmacist, or follow up specific to
14 whatever the point of escalation was.


15 It says "as needed."



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7 Q. (BY MR. BOWER) Okay. Because
8 I think I understand what you're saying,
9 because Mr. Abernathy, for example, testified
10 that he would do some reports if he was the
11 first one in the office, for example.

12 Correct?

13 A. Correct. I read that in his
14 deposition.

15 Q. So under that circumstance, he
16 would be the one responsible for reporting to
17 the DEA a suspicious order?

18 MS. TABACCHI: Object to the
19 form.

20 THE WITNESS: If there was an
21 order that was identified in his
22 shift, he would be responsible for
23 that.

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7 you're asking.

8 Q. (BY MR. BOWER) And I
9 appreciate that. Bullet point 3 refers to
10 monthly reports; correct?

11 A. Correct.

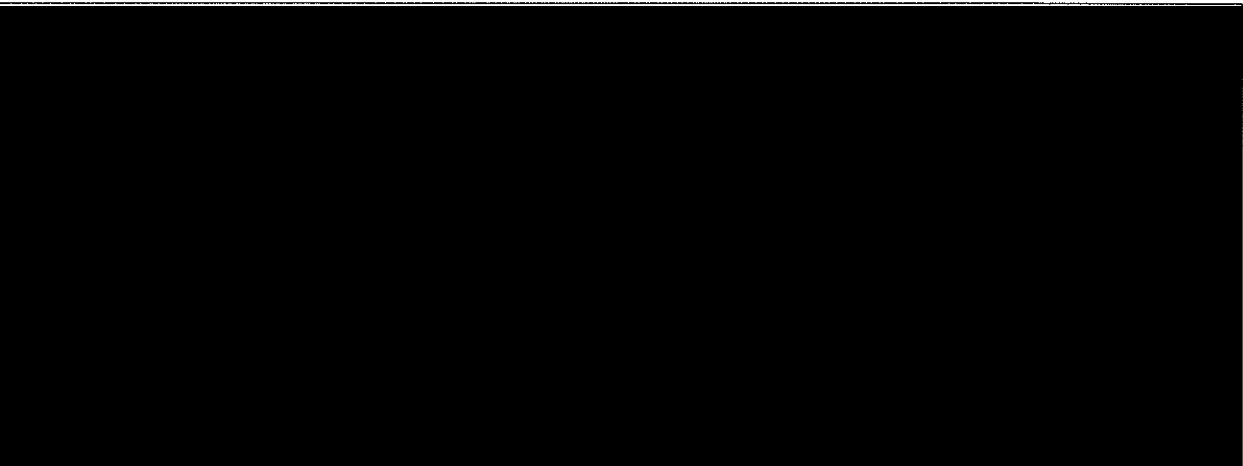
12 Q. Okay. So those reports
13 wouldn't have been used during this time
14 period, at least, to identify an order that
15 came in on a specific day --

16 A. Now I understand the question.

17 Q. -- for you; correct?

18 A. Correct.

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7 A. The enhanced thresholds were
8 calculated using a year's worth of shipment
9 data, and then applying a formula, which was
10 the average weekly order, plus three standard
11 deviations over that 52-week shipment date.

12 Q. And when that formula was used,
13 would that provide the enhancements for a
14 particular store?

15 MS. TABACCHI: Object to the
16 form.

17 THE WITNESS: It was store and
18 item specific. And there were
19 additional defaults that were applied
20 to those thresholds as they were
21 calculated.

22 Q. (BY MR. BOWER) And can you
23 describe for us how those defaults -- let me
24 break that down a little bit.

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1 consider to be too few?

2 MS. TABACCHI: Same objections.

3 THE WITNESS: It would be

4 something that didn't make sense for

5 the business. That we were reviewing